

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
Ex rel, LAWRENCE M. SMITH,	§	
VS.	§	
DEION L. SANDERS,	§	
INDIVIDUALLY,	§	
DAMIEN LAMARC WALLACE,	§	
A/K/A D.L. WALLACE,	§	
INDIVIDUALLY,	§	
FREDERICK R. MAYS,	§	NO. 3:12-CV-4377-M
INDIVIDUALLY,	§	
CHAZMA JONES,	§	
INDIVIDUALLY,	§	
UPLIFT FORT WORTH	§	
CHURCH,	§	
CDC, INDIVIDUALLY,	§	
CHARITY CHURCH	§	
INDIVIDUALLY,	§	
PRIME TIME ASSOCIATION,	§	
INDIVIDUALLY,	§	
TEXAS DEPARTMENT OF	§	
AGRICULTURE,	§	
INDIVIDUALLY,	§	
JANE AND JOHN DOE	§	

**ORIGINAL ANSWER OF DEFENDANTS
DEION L. SANDERS AND PRIME TIME
ASSOCIATION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, DEFENDANTS DEION L. SANDERS and PRIME TIME ASSOCIATION, and file the following answer to Plaintiff's Amended Original Complaint:

I.

1. Defendants deny the allegations in Paragraph 1 of the Amended Petition.

2. Defendants deny the allegations in Paragraph 2 of the Amended Petition.

3. Defendants deny the allegations in Paragraph 3 of the Amended Petition.

4. Defendants admit the allegations in Paragraph 4 of the Amended Petition.

5. Defendants admit the allegations in Paragraph 5 of the Amended Petition.

6. Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 6 of the Amended Petition.

7. Defendants lack sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 7 of the Amended Petition.

8. Defendants admit that this Court has jurisdiction over this case; however Defendants deny that they have committed any acts in violation of 31 U.S.C. § 3729 as alleged in Paragraph 8 of the Amended Petition.

9. Defendants admit the allegations in Paragraph 9 of the Amended Petition.

10. Defendants admit the allegations in Paragraph 10 of the Amended Petition.

11. Defendants admit the allegations in Paragraph 11 of the Amended Petition.

12. Defendants deny the allegations in Paragraph 12 of the Amended Petition, except for Defendant Sanders' address for service purposes.

13. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 13 of the Amended Petition.

14. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 14 of the Amended Petition.

15. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 15 of the Amended Petition.

16. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 16 of the Amended Petition.

17. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 17 of the Amended Petition.

18. Defendants admit that Prime Time Association was a non-profit organization; in all other respects Defendants deny the allegations in Paragraph 18 of the Amended Petition.

19. Defendants deny the allegations in Paragraph 19 of the Amended Petition, except to the extent it alleges that the Texas Department of Agriculture is a state agency.

20. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 20 of the Amended Petition.

21. Defendants admit the allegations in Paragraph 21 of the Amended Petition.

22. Defendants admit the allegations in Paragraph 22 of the Amended Petition.

23. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 23 of the Amended Petition.

24. Defendants admit the allegations in Paragraph 24 of the Amended Petition.

25. Defendants deny the allegations in Paragraph 25 of the Amended Petition.

26. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 26 of the Amended

Petition. To the extent this paragraph alleges any wrongful acts against Defendants, however, the allegations are denied.

27. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 27 of the Amended Petition. To the extent this paragraph alleges any wrongful acts against Defendants, however, the allegations are denied.

28. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 28 of the Amended Petition. To the extent this paragraph alleges any wrongful acts against Defendants, however, the allegations are denied.

29. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 29 of the Amended Petition.

30. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 30 of the Amended Petition.

31. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 31 of the Amended Petition.

32. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 32 of the Amended Petition.

33. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 33 of the Amended Petition.

34. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 34 of the Amended Petition.

35. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 35 of the Amended Petition.

36. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 36 of the Amended Petition.

37. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 37 of the Amended Petition.

38. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 38 of the Amended Petition.

39. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 39 of the Amended Petition.

40. Defendants deny the allegations in Paragraph 40 of the Amended Petition.

41. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 41 of the Amended Petition.

42. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 42 of the Amended Petition.

43. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 43 of the Amended Petition.

44. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 44 of the Amended Petition.

45. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 45 of the Amended Petition.

46. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 46 of the Amended Petition. To the extent this paragraph alleges any wrongful acts against Defendants, however, the allegations are denied.

47. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 47 of the Amended Petition.

48. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 48 of the Amended Petition.

49. Defendants deny the allegations in Paragraph 49 of the Amended Petition.

50. Defendants deny the allegations in Paragraph 50 of the Amended Petition.

51. Defendants deny the allegations in Paragraph 51 of the Amended Petition.

52. Defendants deny the allegations in Paragraph 52 of the Amended Petition.

53. Defendants deny the allegations in Paragraph 53 of the Amended Petition.

54. Defendants deny the allegations in Paragraph 54 of the Amended Petition.

55. Defendants deny the allegations in Paragraph 55 of the Amended Petition.

56. Defendants deny the allegations in Paragraph 56 of the Amended Petition.

57. Defendants deny the allegations in Paragraph 57 of the Amended Petition.

58. Defendants deny the allegations in Paragraph 58 of the Amended Petition.

59. Defendants deny the allegations in Paragraph 59 of the Amended Petition.

60. Defendants deny the allegations in Paragraph 60 of the Amended Petition.

61. Defendants deny the allegations in Paragraph 61 of the Amended Petition.

62. Defendants deny the allegations in Paragraph 62 of the Amended Petition.

63. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 63 of the Amended Petition.

64. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 64 of the Amended Petition.

65. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 65 of the Amended Petition.

66. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 66 of the Amended Petition.

67. Defendants deny the allegations in Paragraph 67 of the Amended Petition.

68. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 68 of the Amended Petition.

69. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 69 of the Amended Petition.

70. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 70 of the Amended Petition.

71. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 71 of the Amended Petition.

72. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 72 of the Amended Petition.

73. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 73 of the Amended Petition.

74. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 74 of the Amended Petition.

75. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 75 of the Amended Petition.

76. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 76 of the Amended Petition.

77. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 77 of the Amended Petition.

78. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 78 of the Amended Petition.

79. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 79 of the Amended Petition.

80. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 80 of the Amended Petition.

81. Defendants deny the allegations in Paragraph 81 of the Amended Petition.

82. Defendants deny the allegations in Paragraph 82 of the Amended Petition.

83. Defendants deny the allegations in Paragraph 83 of the Amended Petition.

84. Defendants deny the allegations in Paragraph 84 of the Amended Petition.

85. Defendants deny the allegations in Paragraph 85 of the Amended Petition.

86. Defendants deny the allegations in Paragraph 86 of the Amended Petition.

87. Defendants deny the allegations in Paragraph 87 of the Amended Petition.

88. Defendants deny the allegations in Paragraph 88 of the Amended Petition.

89. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 89 of the Amended Petition.

90. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 90 of the Amended Petition.

II.

For these reasons, Defendants ask the Court to enter judgment that Plaintiffs take nothing by their suit, that the Court dismiss the suit with prejudice, that the Court assess all costs against Plaintiffs, that the Court award Plaintiffs their reasonable attorney's fees under 31 U.S.C. § 3730 (g), and that the Court order such other and further relief to which Defendants may be entitled.

Respectfully submitted,

/s/ John D. Nation
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CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of this answer on Hon. Don R. Stewart, Attorney for Plaintiffs, 200 E. Main, Arlington, Texas 76010-1126 via the ECF system, on this 11th day of February 2014.

/s/ John D. Nation
John D. Nation